

### **REMARKS/ARGUMENTS**

Claims 16 and 27 are amended, and claims 36-45 are newly added. In addition, claims 1-15 and 31-35 are canceled. Claims 16-30 and 36-45 are now pending in the application. Applicants respectfully request reexamination and reconsideration of the application.

Claims 16-30 were rejected as anticipated by US Patent No. 6,885,202 to Slupsky ("Slupsky") and US Patent Publication No. 2005/0086021 to Khandros et al. ("Khandros"). Applicants respectfully traverse these rejections.

Independent claim 16 recites "an electrically conductive plane disposed between said conductive structures and said functional circuitry." Slupsky does not teach or suggest such a conductive plane. For example, Slupsky does not teach or suggest placing an electrically conductive plane between the wireless i/o cells 14 (which the PTO equated with the conductive structures of claim 16) and any circuitry on dies 12 (which the PTO equated with the dies of claim 16). For at least this reason, claim 16 is patentable over Slupsky.

Moreover, Applicants note that the conductive plane recited in claim 16 provides advantages not found in Slupsky. For example, although claim 16 is not so limited, the conductive plane can shield the functional circuitry of the dies from electromagnetic interference. For example, the conductive plane can shield the functional circuitry of the dies from electromagnetic interaction with transmitter structures that transit test data to the conductive structures of claim 1. The conductive plane recited in claim 16 is therefore not trivial or obvious but provides advantages not found in Slupsky.

Independent claim 27 recites "an electrically conductive plane disposed between said means for receiving a test signal and said functional circuitry." Claim 27 therefore distinguishes over Slupsky for generally the same reasons as discussed above with respect to claim 16. Moreover, claims 17-26, 28-30, and 36-45 depend from claim 16 or claim 27 and, at least for that reason, are also patentable over Slupsky.

Turning now to the rejection of claims 16-30 as anticipated by Khandros, Applicants note that the PTO did not identify any particular portion of Khandros as meeting the recitations in independent claim 16 or claim 27. For example, the PTO did not identify any particular portion of Khandros that is a semiconductor wafer that comprises both a plurality of dies and electrically conductive structures configured to contactlessly receive test signals for testing said functional

circuitry. For at least this reason, the rejection of claims 16-30 as anticipated by Khandros should be withdrawn.

In view of the foregoing, Applicants submit that all of the claims are allowable and the application is in condition for allowance. If the Examiner believes that a discussion with Applicants' attorney would be helpful, the Examiner is invited to contact the undersigned at (801) 323-5934.

Respectfully submitted,

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